

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

IN THE MATTER OF THE SEARCH OF A
U.S. POSTAL SERVICE PARCEL:
TRACKING NUMBER 9505 5101 4221 5113
7329 97 CURRENTLY LOCATED AT
DULLES PROCESSING AND
DISTRIBUTION CENTER AT 44715
PRENTICE DRIVE, DULLES, VIRGINIA
20101, IN THE EASTERN DISTRICT OF
VIRGINIA

Case No. 1:25-SW-422

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR ONE U.S. MAIL PARCEL**

I, Alexander Grant, being duly sworn, hereby depose and state:

INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since August 2023. Upon entering USPIS, I completed twelve weeks of investigator training at the Federal Law Enforcement Training Center’s Criminal Investigator Training Program in Glynco, Georgia. Prior to entering USPIS, I served as a deputy with the United States Marshals Service from July 2019 to August 2023, where I gained experience investigating general crimes and conducting enforcement operations. Prior to this, I was an officer with United States Customs and Border Protection for approximately three years, where I gained experience investigating and interdicting narcotic traffickers and illegal human smuggling at the U.S. port of entry, effecting arrests, and screening passengers and conveyances for safe entry into the United States. Throughout my eight years in law enforcement, I have participated in

investigations concerning currency proceeds from illegal narcotics sales, illegal importation of narcotics, and the smuggling of clandestine substances. I have participated in seizures of narcotics, monies, and weapons.

2. The facts and information contained in this Affidavit are based on my training and experience, personal knowledge, and observations during this investigation, as well as information provided by other agents involved in this investigation. All observations that I did not personally make were relayed to me by those who made the observations. Sources of information I use routinely in narcotics investigations include verifying zip codes through a public database maintained by the U.S. Postal Service (*USPS.com*) and checking associations between names and addresses in a law enforcement database (*CLEAR*). This Affidavit contains only that information necessary to establish probable cause in support of an application for the requested search warrant. This Affidavit is not intended to include every fact and matter observed by or made known to agents of the government.

SUBJECT PARCEL

3. This Affidavit is submitted in support of an Application for a Search Warrant for one subject U.S. Mail Parcel, hereinafter “the **Subject Parcel**” (further described in Attachment A). The **Subject Parcel** is currently located at the U.S. Postal Service, Dulles Processing and Distribution Center, 44715 Prentice Drive, Dulles, Virginia, 20101, which is located within the Eastern District of Virginia. I submit that the facts alleged herein provide probable cause to believe that a search of the **Subject Parcel** will yield evidence, fruits, and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute and Distribution of Controlled Substances) and 846 (Conspiracy to Distribute Controlled Substances).

I therefore request authority to search the **Subject Parcel** for the items described in Attachment B.

4. The **Subject Parcel** is identified as follows:¹

Subject Parcel	Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number	From: <i>Name and Address</i>	To: <i>Name and Address</i>	Current Parcel Location
1	(P) 9505 5101 4221 5113 7329 97	Lucas Anderson 701 Vichy Hills Dr Ukiah ,CA, 95482	Mia Moore 654B Fort Evans rd, Apt B206 Leesburg VA , 20176	Dulles Processing and Distribution Center in Dulles, VA, located in the Eastern District of Virginia

BACKGROUND ON FACTORS INDICATING CONTRABAND

5. Based on my training and experience, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or narcotics proceeds (currency), and personal and financial documents related to such proceeds and narcotics. These factors, detailed more fully below, are used to identify packages requiring further investigation.

6. The **Subject Parcel** exhibited several of these factors and was also alerted to by a trained canine. While there are many characteristics that experienced Postal Inspectors look for, the most common factors or suspicious characteristics are as follows:

¹ For all of the tables in this Affidavit regarding the Subject Parcel, I have listed the sender and recipient information as it appears on the Subject Parcel. In other words, the capitalization, punctuation, and spelling of addresses in the table are the same as that which I observed on the Subject Parcel.

7. Contrasts observed between Legitimate Business Parcels and Drug Parcels:

As alternatives to First-Class Mail, which does not always provide a customer with the ability to track the progress of a parcel through the system, the U.S. Postal Service offers Priority Mail Express and Priority Mail.

- a. Priority Mail Express: Priority Mail Express is guaranteed to be delivered on a set date and time, usually overnight (the deadline is determined at the time of mailing). The customer receives a receipt with this guaranteed information and can opt for a signature requirement when the parcel is delivered. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card.
- b. Priority Mail: Priority Mail has a delivery service standard of two to four business days, but it is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express but still provides the ability to track a parcel. Business Priority Mail Express parcels typically weigh no more than eight ounces, and Business Priority Mail parcels typically weigh no more than two pounds. Drug packages typically exceed these weights; in my experience, it is fairly easy to separate out smaller parcels, which constitute seventy to eighty percent of all Priority Mail Express and Priority Mail parcels, from other

parcels. Address labels on business parcels are typically typed, and address labels on drug packages are typically handwritten. Typically, drug traffickers using Priority Mail Express will opt out of the signature requirement.

- c. First-Class Mail: Some individuals mailing illicit narcotics through the U.S. Postal Service are now utilizing both First-Class package service with tracking, and First-Class mail without tracking, as a way to obscure their illicit activity and to circumvent law enforcement profiling efforts. First-Class packages containing illicit narcotics may weigh less than one pound, or even be mailed in flat envelopes, depending on the type of narcotic involved.

8. **Invalid Sender/Return Address:** When drugs are shipped through the mails, the senders generally do not want them back. To distance themselves from parcels containing drugs, the return addresses and the names of senders are often fictitious or false. A fictitious or false address can be anything from an incorrect zip code to a non-existent house number or street. The name of the sender is also typically invalid: I have seen packages sent by persons with names of celebrities, cartoon characters, or fictional persons, but more often a search of the *CLEAR* database reflects that there is no association between the name of the sender and the address provided.

9. **Invalid Recipient/Address:** It may appear counter-productive to put the wrong receiving address on a package, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

10. **State of Origin:** If other criteria are present, I know from training and experience that a domestic package sent from a source narcotics state, which is a state where narcotics often originate, can further indicate that a parcel contains controlled substances.

11. **Additional Factors:** Additional factors seen less frequently, but noteworthy, include:

a. Smell: The odors of cocaine, marijuana, and methamphetamine are distinct, and, through experience, Postal Inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest the contents are narcotics are from masking agents. Common masking agents used to thwart law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

12. Based upon my training and experience, when a combination of the factors outlined above are observed, a drug detection canine will likely “alert” next to the parcel, indicating the canine has detected the odor of narcotics.

PROBABLE CAUSE

13. On April 23, 2025, the Subject Parcel was mailed from the Ukiah Post Office, 671 S Orchard Ave, Ukiah, CA 95482. On May 1, 2025, your affiant was contacted by USPS employees of the Leesburg Post Office, 25 Catoctin Cir SE, Leesburg, VA 20175, about a suspicious parcel that a male customer was trying to obtain. USPS employees stated that the male customer first called and then showed up in person at the Leesburg Post Office. At the Leesburg Post Office, he provided the package tracking number and a Virginia state-issued driver’s license in an attempt to pick up the package. USPS employees could not verify the male customer as the

correct addressee on the Subject Parcel, as it was addressed to a female name, which did not match the name on the male customer's driver's license. USPS employees advised the subject that the addressee, as written, would need to come to the post office and provide identification to obtain the **Subject Parcel**.

14. Your affiant went to the Leesburg Post Office to intercept, secure, and transport the Subject Parcel to the USPIS Dulles Domicile in the Dulles Processing and Distribution Center. Your affiant then placed the Subject Parcel into secure holding, pending further investigation.

15. As listed in the table below, the **Subject Parcel** has the following characteristics, some of which gave rise to the suspicion of drug distribution:

Subject Parcel	
Priority Express/Priority/Registered/1 st Class	(P) 9505 5101 4221 5113 7329 97
Weight of Parcel	0 lbs and 6.00 ozs
Shipping Label	USPS Priority Mail
Sender Name/Address Associated	SEE PARAGRAPH 18- Not Associated
Recipient Name/Address Associated	SEE PARAGRAPH 19- Not Associated
Signature Requirement	N/A
State of Origin	Yes, California
Canine Alert	Yes, Canine Mia
Other Suspicious Characteristics	SEE PARAGRAPH 13- Unknown person attempted pick-up at the post office

16. Your affiant reviewed records from CLEAR to conduct a check of the return address listed for the Subject Parcel, to wit, "Lucas Anderson 701 Vichy Hills Dr Ukiah ,CA, 95482." Your affiant determined the address is a valid address, but further inquiry using CLEAR did not show a current association of the name "Lucas Anderson" to the address. The entry of a

false addressee, recipient name, or incomplete address on the shipping label also provides the true intended recipient with plausible deniability should law enforcement confront them.

17. Your affiant reviewed records from CLEAR to conduct a check of the recipient address listed for the Subject Parcel, to wit, “Mia Moore 654B Fort Evans rd, Apt B206 Leesburg VA , 20176.” Your affiant determined that the address is invalid as written and further inquiry using CLEAR did not show a current association of the name “Mia Moore” to the address. Again, the entry of a false addressee, recipient name, or incomplete address on the shipping label also provides the true intended recipient with plausible deniability should law enforcement confront them.

18. Based on the suspicious characteristics described above, the **Subject Parcel** was presented to a trained police canine for examination on May 2, 2025. Canine Mia and her handler, Loudoun County Sheriff’s Office Master Deputy M. Steinfurth, were utilized to determine whether the **Subject Parcel** contained illegal narcotics. Standard protocols for canine detection were followed using Canine Mia. Canine Mia was last certified on April 29, 2025, to alert on the odors of heroin, methamphetamine, and cocaine. Canine Mia is trained regularly to ensure the canine’s accuracy in the detection of drug odors.

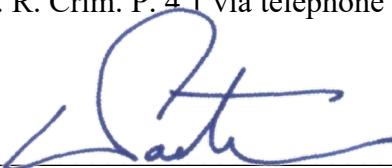
21. The **Subject Parcel** was placed among other USPS Mail at the USPS Dulles Processing and Distribution Center, in Dulles, Virginia. At that time, Loudoun County Sheriff’s Office Master Deputy M. Steinfurth and Canine Mia were brought in to search the area. The handler observed Canine Mia and then informed PI Lineberry that the canine alerted on the **Subject Parcel**, which was hidden arbitrarily among other USPS Parcels.

CONCLUSION

22. I submit that, based upon the above indicators exhibited by the **Subject Parcel**, as well as the positive canine alert on the **Subject Parcel**, there is probable cause to believe that the above-described **Subject Parcel** contains narcotics, controlled substances, and/or materials relating to the distribution of controlled substances through the United States Mail. Therefore, I respectfully request that this Court issue a search warrant for the **Subject Parcel**, as described in Attachment A, authorizing the seizure of the items described in Attachment B.

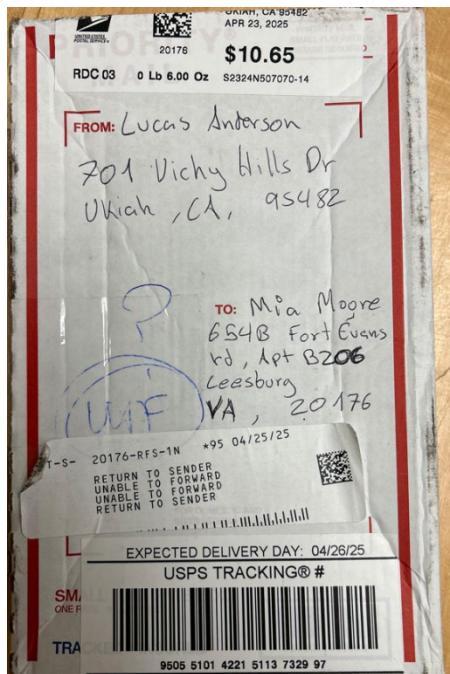
Alexander B Grant
Alexander Grant
United States Postal Inspector

Attested to in accordance with the requirements of
Fed. R. Crim. P. 4.1 via telephone on May 12, 2025:


The Honorable William B. Porter
United States Magistrate Judge
Alexandria, Virginia

ATTACHMENT A**DESCRIPTION OF PARCELS TO BE SEARCHED**

<i>Subject Parcel</i>	<i>Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>	<i>Current Parcel Location</i>
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ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED

1. Narcotics or other controlled substances, as well as contraband related to drug trafficking,
e.g., packaging materials;
2. United States currency or other financial instruments that appear to be proceeds related to
the distribution or purchase of illegal narcotics;
3. Customer records related to drug trafficking;
4. Business ledgers, lists, and notations relating to drug trafficking;
5. Prescription records;
6. Financial records that suggest how payment for illegal narcotics is conducted; and
7. Other evidence, fruits, and/or instrumentalities of transactions related to drug trafficking.